

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF ALBERTO  
SAFRA FOR AN ORDER TO TAKE  
DISCOVERY FOR USE IN FOREIGN  
PROCEEDINGS PURSUANT TO 28  
U.S.C. § 1782

Case No. 21-MC \_\_\_\_\_

**DECLARATION OF LUCAS BENTO**

Pursuant to 28 U.S.C. § 1746, I, Lucas Bento, declare as follows:

1. I am an attorney duly admitted to practice in New York and before this Court. I am Of Counsel in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Petitioners in this matter.

2. I submit this declaration in support of Alberto Safra ("**Petitioner**")'s Application and Petition For An Order to Conduct Discovery For Use In Foreign Proceedings Pursuant To 28 U.S.C. § 1782 (the "**1782 Application**"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the 1782 Application and accompanying memorandum of law.

3. Attached as **Exhibit 1** is a proposed order granting Petitioners' 1782 Application.

4. Attached as **Exhibit 2** are draft subpoenas addressed to Respondents.

5. Attached as **Exhibit 3** is a true and accurate copy of Dr. Viviane Tabar's profile webpage on the Memorial Sloane Kettering Cancer Center website, available at <https://www.mskcc.org/cancer-care/doctors/viviane-tabar>

6. Attached as **Exhibit 4** is a true and accurate copy of Dr. Eli Diamond's profile webpage on the Memorial Sloane Kettering Cancer Center website, available at <https://www.mskcc.org/cancer-care/doctors/eli-diamond>

7. Attached as **Exhibit 5** is a true and accurate copy of Dr. Valentin Fuster's profile webpage on the Mt. Sinai Health System website, available at

<https://www.mountsinai.org/profiles/valentin-fuster>

8. Attached as **Exhibit 6** is a true and accurate copy of Dr. Susan Bressman's profile webpage on the Mount Sinai Health System website, available at

<https://www.mountsinai.org/profiles/susan-bressman>

9. Attached as **Exhibit 7** is a true and accurate copy of the Memorial Sloan Kettering Cancer Center's location directory webpage available at

<https://www.mskcc.org/locations/directory?region=New%20York%20City>

10. Attached as **Exhibit 8** is a true and accurate copy of the Mount Sinai Health System's location directory webpage, available at <https://www.mountsinai.org/locations>

11. Attached as **Exhibit 9** is a true and accurate copy of the Memorial Sloan Kettering Cancer Center's LinkedIn profile webpage, available at

<https://www.linkedin.com/company/memorial-sloan-kettering-cancer-center>

12. Attached as **Exhibit 10** is a true and accurate copy of Mt. Sinai Health System's LinkedIn profile webpage, available at <https://www.linkedin.com/company/mountsinainyc>

13. Attached as **Exhibit 11** is a true and accurate copy of the article entitled "'Joseph Safra, Banker Who Was the Richest Brazilian, Dies at 82, New York Times, December 16, 2020', available at <https://www.nytimes.com/2020/12/16/world/americas/joseph-safra-banker-who-was-the-richest-brazilian-dies-at-82.html>.

14. On August 5, 2021, I mailed and emailed, on behalf of the Petitioner, a copy of the 1782 Application and accompanying documents, including the proposed subpoenas, to Mrs. Vicky Safra. Attached as **Exhibit 12** is a copy of the letter sent in substantial form to Ms. Vicky Safra

(except for the insertion of the docket number in this case, which was only generated after the filing).

15. Attached as **Exhibit 13** is a true and accurate copy of Dr. Viviane Tabar's profile on the Healthgrades webpage, available at <https://www.healthgrades.com/physician/dr-viviane-tabar-y6gd8>.

16. Attached as **Exhibit 14** is a true and accurate copy of Dr. Eli L Diamond's profile on the WebMD webpage, available at <https://doctor.webmd.com/doctor/eli-diamond-45acb2d5-5317-4568-992e-508ed203fd41-appointments>.

17. No prior application for similar relief has been made by Petitioner.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in New York, New York on August 5, 2021.

  
Lucas Bento